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December 14, 2018

Via ECF

Hon. Steven L. Tiscione, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Chincha v. Patel
Case No.: 17-cv-06127-ILG-ST

Your Honor:

This firm represents the named Plaintiff Carlos Chincha in the above-referenced action brought under the Fair Labor Standards Act and New York Labor Law. We write, jointly with Defendants' consent, to submit a status report on the case pursuant to the Court's Order dated 8/28/18 and to jointly request an extension of the discovery deadline, which is currently December 15, 2018. This is the parties' first request of an extension of this deadline.

During this litigation, counsel for the parties have diligently attempted to settle this case, including but not limited to engaging in informal and formal discovery and negotiating directly with each other and with the assistance of a third-party mediator. Unfortunately, the parties remain far apart and unable to resolve this matter. In moving this case along, the parties have engaged in further meaningful discovery, but due to several pending discovery disputes, have not yet conducted depositions. As such, we respectfully ask that the Court grant a two-month extension of the discovery deadline, i.e. until February 15, 2018, to give the parties sufficient time to resolve all pending disputes between themselves and then finalize any depositions.

We thank the Court for its attention and consideration to this matter.

Respectfully submitted,
LAW OFFICES OF WILLIAM CAFARO

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To: All Counsel via ECF